



United States Environmental Protection Agency
Region I
5 Post Office Square, Suite 100
Boston, MA 02109-3912

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

January 6, 2014

Mr. Robert Thomson, Facilities Manager
RBC Aircraft Products Inc.
2788 Winsted Road
Torrington, CT 06790

Re: **NOTICE OF VIOLATION** of the applicable Generators Standards of Hazardous Waste, Section 3002 of the Resource Conservation and Recovery Act of 1976 (RCRA) and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. §§ 6622(a) and 6924(d) through (m) and the Regulations of Connecticut State Agencies (RCSA):22a-449(c)-102 and 22a-449(c)-108.

Dear Mr. Thomson:

On October 29, 2013, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection (CEI) at RBC Aircraft Products Inc., (RBC) in Torrington, Connecticut. The purpose of this inspection was to determine the compliance of RBC, EPA ID No. CTR000506659, with Connecticut Hazardous Waste Regulations RCSA 22a-449(c)-102 and 22a-449(c)-108 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Connecticut has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection, EPA has determined that your facility violated certain provisions of the Connecticut Hazardous Waste Regulations and the RCRA regulations promulgated at 40 CFR Part 260 through Part 272. The specific violations are set forth below:

1. Failure to clearly mark and label containers where hazardous waste is stored with the words "Hazardous Waste" other words that identify the contents of such container such as "flammable", "acid", "alkaline", "cyanide", "reactive", "explosive", "halogenated solvent" or the chemical name, as required by RCSA §22a-449(c)-102(a)(2)(N), which incorporates by reference 40 CFR §262.34(c)(1)(ii).

At the time of the inspection, the label on one, 25-cubic yard Roll-Off was washed-out. The Roll-Off was identified as a 90-day Hazardous Waste Storage Area and was located on a cement pad, outside, in a parking lot.

At the time of the inspection, two adjacent metal hoppers used to store hazardous waste swarf, were not labeled. The two metal hoppers were associated with the aqueous based central coolant filter unit.

At the time of the inspection, two adjacent waste grinding wheels were accumulating on the floor next to the hazardous waste swarf hoppers associated with the aqueous-based central coolant filter unit. The waste grinding wheels were not labeled.

At the time of the inspection, the hazardous waste label on one, 55-gallon steel drum was partially washed-out. The 55-gallon steel drum was located near the "Tumble" area.

2. Failure to maintain closed hazardous waste containers when no waste was being added or removed, as required by RCSA §22a-449(c)-102(a)(1), which incorporates by reference 40 CFR §262.34(a)(1) and 40 CFR §265.173(a).

At the time of the inspection, two adjacent metal hoppers, used to store hazardous waste swarf, were not closed. The two metal hoppers were associated with the aqueous based central coolant filter unit.

At the time of the inspection, one 55-gallon blue poly drum with lid was not closed. The drum was being used to store hazardous waste aerosols.

3. Failure to accumulate hazardous waste in containers at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste, as required by RCSA §22a-449(c)-102(a)(1), which incorporates by reference 40 CFR §262.34(c)(1).

At the time of the inspection, two adjacent waste grinding wheels and a small quantity of waste swarf were accumulating on the floor next to the waste swarf hoppers associated with the aqueous-based central coolant filter unit. The waste grinding wheels and waste swarf were not in containers.

RBC Aircraft Products Inc. is hereby required to:

A. Immediately upon receipt of this NOTICE:

1. Mark and label hazardous waste containers with the words "Hazardous Waste," as required by RCSA §22a-449(c)-102(a)(2)(N), which incorporates by reference 40 CFR §262.34(c)(1)(ii).
2. Close hazardous waste containers when no waste is being added or removed, as required by RCSA §22a-449(c)-102(a)(1), which incorporates by reference 40 CFR §262.34(a)(1) and 40 CFR §265.173(a).
3. Place hazardous waste accumulating at or near any point of generation where wastes initially accumulate which is under the control of the operator of the process generating the waste in containers, as required by RCSA §22a-449(c)-102(a)(1), which incorporates by reference 40 CFR §262.34(c)(1).

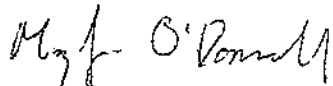
B. Within thirty (30) calendar days of receipt of this NOTICE:

1. Submit a written description, with supporting documentation, of the actions taken to correct the aforementioned violations to:

Mr. Donald MacLeod, Environmental Engineer
RCRA, EPCRA and Federal Programs Unit
U.S. Environmental Protection Agency
5 Post Office Square - Suite 100
Boston, Massachusetts 02109-3912

Failure to correct the violations, as required by this **NOTICE** may subject RBC Aircraft Products Inc. to further Federal enforcement action, including an assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 692. If you have any questions regarding this NOTICE, please contact Donald MacLeod or my staff at (617) 918-1405.

Sincerely,



Mary Jane O'Donnell, Acting Manager
RCRA, EPCRA & Federal Programs Unit

cc: Robert Isner, CTDEEP
RCRA file

